IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

DELTON GOODRUM,

Plaintiff,

٧.

CIVIL ACTION NO. 1:24cv1111

CITY OF ALEXANDRIA,

Defendant.

RESPONSE TO MOTION IN LIMINE

COMES NOW the City of Alexandria, by counsel, and states that it has reached an agreement with counsel for plaintiff related to episodes of prior discipline. In particular, the parties agree that references to disciplinary findings prior to 2018 will not be made during trial. An appropriate draft order will follow for the consideration of the Court.

CITY OF ALEXANDRIA

/s/ James A. Cales III

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CERTIFICATE

I hereby certify that on the 23d day of April, 2025, I will electronically file the foregoing with the Clerk of Court using the CM/ECF. system, which will then send a notification of such filing to the following:

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